

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF VERMONT

UNITED STATES OF AMERICA,)	
)	
v.)	Docket No. 2:19-cr-00148
)	
KIMBERLY JONES,)	
Defendant.)	

MOTION FOR DETENTION

The United States of America, by and through its attorney, Christina E. Nolan, United States Attorney for the District of Vermont, moves for pretrial detention of the above-named defendant pursuant to 18 U.S.C. § 3142(e) and (f).

1. Eligibility for Detention. This defendant is eligible for detention because the case involves an offense under the Controlled Substances Act for which a maximum term of imprisonment of ten years or more is prescribed. 18 U.S.C. § 3142(f)(1)(C).

2. Reason For Detention. The Court should detain the defendant because there are no conditions of release that will reasonably assure the safety of the community.

3. Rebuttable Presumption. Based on the defendant's October 24, 2019 indictment (Doc. No. 23), the United States invokes the rebuttable presumption against defendant under § 3142(e).

4. Other Matters. Jones has been charged with one count of distributing methamphetamine. This is an exceedingly serious charge involving a highly addictive and dangerous illegal drug. The evidence, including audio and video recordings of the transaction, is very strong. In addition, law enforcement's investigation shows that Jones had knowledge of other methamphetamine transactions involving her co-defendants and described in the indictment in this case. In terms of Jones's history and characteristics, Jones has the following convictions:

- 2015 Vermont felony conviction for grand larceny.

- 2015 Vermont felony conviction for forgery.
- 2012 Vermont misdemeanor convictions for retail theft and for providing false information to law enforcement.
- 2005 Vermont felony conviction for forgery.

Jones also appears to be an active drug user, including a methamphetamine user. In addition, Jones is facing Massachusetts state drug charges after a car stop on October 6, 2019 in Shelburne Falls, Massachusetts. It appears Jones had methamphetamine on her and gave law enforcement a false name when confronted by Massachusetts police. Based on law enforcement's investigation, Jones is linked to the distribution of significant quantities of methamphetamine in Chittenden County for at least the past six months. As stated earlier, methamphetamine is an exceedingly dangerous drug. As a user and distributor of methamphetamine, Jones poses a large risk to the safety of the community

The severity of the federal crime for which Jones is charged, the other evidence of her involvement in illegal drug trafficking, and her apparent status as a methamphetamine user demonstrate that there is no set of conditions of release that will reasonably assure the safety of the community.

5. Time For Detention Hearing. The United States requests the court conduct the detention hearing after the pretrial services officer has had sufficient time to complete a bail report.

Dated at Burlington, in the District of Vermont, this 21st day of November, 2019.

Respectfully submitted,

UNITED STATES OF AMERICA

CHRISTINA E. NOLAN
United States Attorney

By: /s/ *Nikolas P. Kerest*
NIKOLAS P. KEREST
Assistant United States Attorney
11 Elmwood Avenue
Burlington, VT 05401
(802) 951-6725
nikolas.kerest@usdoj.gov